## IN THE UNITED STATES CIRCUIT COURT OF APPEALS FOR THE NINTH CIRCUIT

### S. ROWAN WILSON,

Plaintiff-Appellant,

v.

ERIC HOLDER, as Attorney General of the United States; THE U.S. BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES; B. TODD JONES, as Acting Director of the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives; ARTHUR HERBERT, as Assistant Director of the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives; and THE UNITED STATES OF AMERICA,

Defendants-Appellees.

# APPEAL FROM THE UNITED STATES DISTRICT COURT, DISTRICT COURT OF NEVADA

#### PLAINTIFF S. ROWAN WILSON'S MOTION TO EXCEED PAGE LIMITS

Rainey Legal Group PLLC CHARLES C. RAINEY, ESQ. Nevada Bar No. 10723 Chaz@raineylegal.com JENNIFER J. HURLEY, ESQ. Nevada Bar No. 11817 Jennifer@raineylegal.com 9340 West Martin Avenue Las Vegas, Nevada 89148 Telephone: +1.702.425.5100 Facsimile: +1.888.867.5734 Attorneys for Plaintiff/Appellant Pursuant to Ninth Circuit Rule 32-2, Appellant respectfully seeks the Court's leave to file

an Opening Brief in excess of the thirty pages allotted by rule for Briefs. Specifically, Appellant

respectfully requests the Court's leave to file an Opening Brief of 54 pages in length. This request

is justified by the District Court's 27-page Order. See Doc. No. 49. Appellant has made diligent

efforts to reduce the length of the Opening Brief but simply cannot address all issues raised by the

District Court's Order in 30 pages.

This case involves novel issues surrounding the ability of persons complying with State

medical marijuana laws to legally obtain and possess firearms. Appellant submits that this case

raises numerous momentous issues, both legal and factual, of overriding importance not only to

the parties, but to the People of Nevada and to the Nation at large. Appellant respectfully submits

that a 54-page Opening Brief is warranted to address these matters fairly and efficiently. Appellant

therefore request leave to file an Opening Brief that is 54 pages in length.

DATED: July 21, 2014.

Respectfully Submitted by:

/s/Charles C. Rainey\_

CHARLES C. RAINEY, ESQ.

Nevada Bar No. 10723

Chaz@raineylegal.com

JENNIFER J. HURLEY, ESQ.

Nevada Bar No. 11817

Jennifer@raineylegal.com

9340 West Martin Avenue

Las Vegas, Nevada 89148

Telephone: +1.702.425.5100

Facsimile: +1.888.867.5734

Attorneys for Plaintiff/Appellant

1

### **CERTIFICATE OF SERVICES**

I, Jennifer J. Hurley, an employee of Rainey Legal Group PLLC, certify that the following individuals were served with the foregoing **PLAINTIFF S. ROWAN WILSON'S MOTION TO EXCEED PAGE LIMITS**, on this date by the below identified method of service:

**Electronic Case Filing** 

TONY WEST
DANIEL G. BOGDEN
SANDRA SCHRAIBMAN
ALICIA N. ELLINGTON
JOHN K. THEIS
Trial Attorneys, Federal Programs Branch
United States Department of Justice, Civil Division
20 Massachusetts Ave, N.W. Rm 7226
Washington, DC 20530

Zachary Richter Trial Attorney, Constitutional Torts Staff United States Department of Justice, Civil Division P.O. Box 7146, Ben Franklin Station Washington, DC 20044

DATED this 21st day of July 2014.

/s/ Jennifer J. Hurley
An employee of Rainey Legal Group PLLC